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10 IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 **MARK AARON HAYNIE, BRENDAN
12 JOHN RICHARDS, THE CALGUNS
13 FOUNDATION, INC., and THE SECOND
14 AMENDMENT FOUNDATION, INC.,**

10-cv-1255-SI
11-cv-2493 SI
(Consolidated Cases)

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management**

Plaintiffs,

v.

15 **KAMALA HARRIS, Attorney General of
16 California (in her official capacity) and
17 CALIFORNIA DEPARTMENT OF
18 JUSTICE, CITY OF ROHNERT PARK,
OFFICER DEAN BECKER (RP134), and
DOES 1 TO 20,**

11-cv-5580 SI
(Related Case)

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management**

Defendants.

19 **BRENDAN JOHN RICHARDS, THE
20 CALGUNS FOUNDATION, INC., and THE
21 SECOND AMENDMENT FOUNDATION,
INC.,**

Plaintiffs,

v.

23 **KAMALA HARRIS, Attorney General of
24 California (in her official capacity),
25 CALIFORNIA DEPARTMENT OF
JUSTICE, SONOMA COUNTY
SHERIFF'S OFFICE, SHERIFF'S
26 DEPUTY GREG MYERS (SD1023) and
DOES 1 TO 20**

Defendants.

1 **MAX JOSEPH PLOG-HOROWITZ, THE
2 CALGUNS FOUNDATION, INC., and THE
3 SECOND AMENDMENT FOUNDATION,
4 INC.,**

12-cv-00452 (LB)
(Related Case)

Plaintiffs,

5 **v.**

6 **KAMALA HARRIS, Attorney General of
7 California, CALIFORNIA DÉPARTMENT
DEPARTMENT, CITY OF COTATI,
8 ANDREW LYSSAND (CO0339) and DOES
1 TO 20,**

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management**

Defendants.

10 IT IS HEREBY STIPULATED¹ by and between the parties hereto through their respective
11 attorneys of record that the pending Case Management Conference currently set for July 27, 2012
12 in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California
13 should be reset.

14 The Defendants in *Richards v. Harris I (Rohnert Park)*, Case No.: 3:11-CV-02493 SI have
15 a motion to dismiss under submission that has been fully briefed and was argued on May 4, 2012.
16 The parties believe that it would be a more productive use of the Court's time and resources to
17 have the Case Management Conference after a ruling on the motion to dismiss has been issued

18 Accordingly, the parties propose that the Court reset the Case Management Conference to
19 some date after the Court anticipates releasing its order from the May 4, 2012 hearing.

20 For the convenience of the Court and its staff, Plaintiffs' counsel advises that he is
21 unavailable on the following Fridays: August 10 and 17, September 27, and October 5, 2012.

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25 ¹ *Haynie v. Harris*, Case No.: 3:10-CV-01255 SI was ordered consolidated with *Richards*
26 *v. Harris*, Case No.: 3:11-CV-02493 SI, in an order filed on October 22, 2011. (See Documents #
42 and #15 respectively.) The second *Richards v. Harris*, Case No.: 3:11-CV-05580 was ordered
27 to be related with the first two cases in an order filed on December 21, 2011. (See documents #47
and # 20 respectively.) The *Ploghorowitz v. Harris*, Case No.: 3:12-CV-0452 SI was ordered to
be related on April 11, 2012. (See documents #32 and #20.)

SO STIPULATED.

Dated: July 19, 2012

Dated: July 19, 2012

/s/ Ross Moody

/s/ Donald Kilmer

Ross Moody
Counsel for Defendants
Harris & California Dept. of Justice

Donald Kilmer
Counsel for Plaintiffs

Dated: July 19, 2012

/s/ Robert W. Henkels

Robert W. Henkels
Counsel for Defendants
City of Rohnert Park & Becker
Counsel for Defendants
Cotati Police Department,
City of Cotati, & Lyssand

ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND LOCAL RULE VIII.B.

I, Ross C. Moody, declare under penalty of perjury under the laws of California and the United States that I have in my possession e-mail correspondence from Donald Kilmer and Robert Henkels that the content of this document is acceptable to all persons required to sign the document. I declare that this document was signed in San Francisco, CA on July 19, 2012.

/s/ Ross Moody

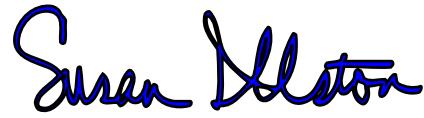
Ross Moody
Deputy Attorney General
Attorney for Defendants
California Department of Justice and
Attorney General Kamala D. Harris

ORDER

The Case Management Conference in these consolidated and related matters currently set for July 27, 2012 is reset to: (Date) August 24, 2012, at (Time): 3:00 p.m., in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California –

1 San Francisco. A Joint Case Management Conference Statement shall be filed seven (7) calendar
2 days before the new date.

3 Date: 7/24/12



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5 United States District Judge
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